

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC. 20554**

In the Matter of)	
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FCC Localism Task Force)	RM-10803
- Public Comment)	
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To: The Commission

**COMMENTS of Nickolaus E. Leggett
N3NL Amateur Radio Operator**

The following is a set of comments from Nickolaus E. Leggett, an amateur radio operator (Extra Class licensee – call sign N3NL), inventor (U.S. Patents # 3,280,929 and 3,280,930 and one electronics invention patent application pending), and a certified electronics technician. I also have a Master of Arts degree in Political Science from the Johns Hopkins University (May 1970).

I am one of the original petitioners for Low Power FM (LPFM) broadcasting in RM-9208 (July 1997). My comments here are specific suggestions to the Commission's new task force on localism in broadcasting.

Localism and Legitimacy

The legitimacy of the American broadcasting structure and its regulation depends on the presence of a local component to broadcasting. American citizens expect that there should be independent local broadcast stations as well as stations that are linked into large networks.

American citizens do not accept the concept that most or all of broadcasting should be concentrated into the hands of a few giant corporations. This rejection was

shown by the flood of unfavorable comments from the public concerning media ownership.

The American economic, social, and political tradition is one of pluralism where big and small entities co-exist. Americans drive used economy cars and Rolls-Royces on the same roads. Americans own and operate rowboats and giant ships. Americans own and operate tiny ultra-light aircraft and 747 transport planes. Americans own tiny houses and giant ranches.

So why is broadcasting increasingly limited to giant organizations offering a standardized content? Why can't an individual such as me set up a broadcasting station in my hometown of Reston, Virginia to serve neighborhood needs?

To date, the best argument for big centralized media has been the shortage of available radio frequencies. However, this shortage is fading since millimeter radio frequencies could be used for neighborhood and community broadcasting. These frequencies are blessed with a fairly high level of atmospheric signal absorption. This absorption of the radio waves is a good thing because it creates naturally enforced coverage cells and encourages extensive frequency re-use.

Another argument for big centralized media is the economy of scale. A big media giant can afford to spend a lot of money to develop programming and to support a large news team. However, individuals and local groups could finance a tiny microradio broadcasting station here in Reston. Local talent could operate the station and provide local information and content. This microradio station would be a niche-market station that would offer localism. The station would not compete directly with the various broadcast and cable media giants.

The Localism Task force needs to effectively address options that promote access to the media by local citizens and content providers. The bottom line on this is some method or combination of methods must be provided so that local neighborhoods can have their own outlets for opinions, neighborhood news, local sports, and creative productions.

Specific Options to Encourage Localism

The following options to promote localism should be examined and evaluated by the Localism Task Force:

1. Increased licensing of **Low Power FM (LPFM)** broadcast stations including stations in urban areas. The Congressional restrictions on LPFM channels are not supported by the recently released engineering study conducted by MITRE.
2. Establishment of a **Low Power AM (LPAM)** broadcasting service. I understand that there are several petitions before the Commission proposing such a service.
3. Establishment of a **Citizens Broadcasting Band (CBB)** on frequencies other than those currently used for domestic broadcasting. The CBB would allow individual citizens to own and operate microradio (under 10 Watt) broadcasting stations on shared frequency channels.
4. Establishment of an **Open Microphone** broadcasting service operated with funds provided by taxes on large broadcasting corporations.
5. Requiring full-power broadcast stations to offer **no-charge sub carrier channels** to community organizations.

6. Requiring full-power broadcast stations to provide a **minimum amount of local programming** using local staff members.
7. Contract with university research teams to explore the use of **millimeter waves and light waves** for neighborhood broadcasting systems. Use of these frequency ranges could eliminate the current shortage of radio frequency spectrum.
8. Evaluation of **Internet audio streaming** broadcasting for local broadcasting purposes.

All of these options would increase the number of local broadcasting outlets that would be accessible by local citizens.

Respectfully submitted,

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